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Attorney for Plaintiffs  
AVID AMIRI, Individually and as  
Trustee of the DEUTSCHE  
INTERNATIONAL TRUST II

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

AVID AMIRI, Individually and as	)	Case No. 19-cv-373-JAO-RT
Trustee of the DEUTSCHE	)	
INTERNATIONAL TRUST II,	)	
	)	JOINT REPORT OF RULE 26(f)
Plaintiffs,	)	MEETING
vs.	)	
	)	
COUNTY OF MAUI; DOE	)	
DEFENDANTS 1-100,	)	
	)	
Defendants.	)	
	)	
	)	

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JOINT REPORT OF RULE 26(f) MEETING

Pursuant to Fed. R. Civ. P. 26(f), the parties conferred on August 19, 2019,  
with John K. Holiona acting for Defendant County of Maui, and Gregory A. Ferren

acting for Plaintiffs Avid Amiri and Deutsche International Trust II.

The following is the report of that meeting:

1. The date for the exchange of the information required by Fed. R. Civ. P. 26(a)(1) shall be September 18, 2019. The parties do not believe that any changes should be made in the timing, form, or requirement for disclosures.
2. The issues for discovery relate to the planning, construction, maintenance, and repair of the road and culvert at issue in this case, and Plaintiffs' injuries and damages.
3. Deadlines for discovery, including deadlines for submission of reports by retained experts, and for supplementation of discovery responses, will be set at the scheduling conference.
4. At the time, the parties do not see any reason to deviate from the limitations on discovery set by the Federal Rules of Civil Procedure.
5. The parties do not believe that there are any unique issues regarding disclosure, discovery, the preservation of electronic information, the assertions of privileges, or protection of trial materials.
6. All other deadlines should be set at the scheduling conference.
7. The parties believe that this case can be ready for trial within 12 months.
8. The parties believe that engaging in alternative dispute resolution

prior to conducting discovery would be premature. The parties are willing to consider alternative dispute resolution after discovery is conducted.

DATED: Honolulu, Hawaii, August 19, 2019.

/s/ Gregory A. Ferren  
GREGORY A. FERREN  
Attorney for Plaintiffs

/s/ John K. Holiona  
JOHN K. HOLIONA  
Attorney for Defendant  
COUNTY OF MAUI